

EXHIBIT B

<p>1 UNITED STATES DISTRICT COURT</p> <p>2 EASTERN DISTRICT OF VIRGINIA</p> <p>3 (Richmond Division)</p> <p>4 ePLUS, inc.,</p> <p>5 Plaintiff,</p> <p>6 -against- Civil Action No.</p> <p>7 3:09-cv-620(JRS)</p> <p>8 LAWSON SOFTWARE, INC.,</p> <p>9 Defendant.</p> <p>10</p> <p>11 June 10, 2010</p> <p>12 10:44 a.m.</p> <p>13 Videotaped Deposition of LAURENE McENENY,</p> <p>14 taken pursuant to Subpoena, at the offices of</p> <p>15 Goodwin Procter LLP, 620 Eighth Avenue, New</p> <p>16 York, New York, before ERIC J. FINZ, a Shorthand</p> <p>17 Reporter and Notary Public within and for the</p> <p>18 State of New York.</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24 JOB NO.: 24-180169</p> <p>25 Pages: 1 - 233</p>	<p>1 THE VIDEOGRAPHER: This is the</p> <p>2 video operator speaking, Douglas Huebner of</p> <p>3 Merrill Legal Solutions. Today is June 10,</p> <p>4 2010, and the time is 10:44.</p> <p>5 We are at the offices of Goodwin</p> <p>6 Procter, 620 Eighth Avenue, New York, New</p> <p>7 York, to take the video deposition of</p> <p>8 Laurene McEneny, in the matter of ePlus,</p> <p>9 Inc. versus Lawson Software, Inc., in the</p> <p>10 United States District Court, Eastern</p> <p>11 District of Virginia, Richmond Division,</p> <p>12 Case No. 3:09-cv-620.</p> <p>13 Will counsel please introduce</p> <p>14 themselves for the record.</p> <p>15 MR. REDDY: Srikanth Reddy from the</p> <p>16 law firm of Goodwin Procter on behalf of</p> <p>17 the plaintiff ePlus, Inc.</p> <p>18 MR. ROBERTSON: Scott Robertson</p> <p>19 from Goodwin Procter for plaintiff.</p> <p>20 MS. HUGHEY: Rachel Hughey from</p> <p>21 Merchant & Gould for defendant Lawson</p> <p>22 Software.</p> <p>23 MR. SAHNER: Todd M. Sahner from</p> <p>24 Marcus Brody on behalf of the witness.</p> <p>25 THE VIDEOGRAPHER: Will the court</p>
<p>1 APPEARANCES:</p> <p>2 GOODWIN PROCTER LLP</p> <p>3 Attorneys for Plaintiff</p> <p>4 Exchange Place</p> <p>5 Boston, Massachusetts 02109</p> <p>6</p> <p>7 BY: SRIKANTH K. REDDY, ESQUIRE</p> <p>8</p> <p>9 -AND-</p> <p>10</p> <p>11 GOODWIN PROCTER LLP</p> <p>12 901 New York Avenue, Northwest</p> <p>13 Washington, DC 20001</p> <p>14</p> <p>15 BY: SCOTT L. ROBERTSON, ESQUIRE</p> <p>16</p> <p>17 MERCHANT & GOULD</p> <p>18 Attorneys for Defendant</p> <p>19 80 South Eighth Street</p> <p>20 Minneapolis, Minnesota 55402</p> <p>21</p> <p>22 BY: RACHEL C. HUGHEY, ESQUIRE</p> <p>23</p> <p>24</p> <p>25</p> <p>1 MARCUS BRODY FORD KESSLER & SAHNER LLC</p> <p>2 Attorneys for the Witness</p> <p>3 5 Becker Farm Road</p> <p>4 Roseland, New Jersey 07068</p> <p>5</p> <p>6 BY: TODD M. SAHNER, ESQUIRE</p> <p>7</p> <p>8</p> <p>9</p> <p>10 ALSO PRESENT:</p> <p>11</p> <p>12 DOUGLAS HUEBNER, Videographer</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 reporter please swear the witness.</p> <p>2 LAURENE McENENY,</p> <p>3 having been first duly sworn by the Notary</p> <p>4 Public (Eric J. Finz), was examined and</p> <p>5 testified as follows:</p> <p>6 EXAMINATION BY</p> <p>7 MR. REDDY:</p> <p>8 Q. Good morning. Would you please</p> <p>9 state your full name for the record?</p> <p>10 A. My name is Laurene Jean, maiden</p> <p>11 name, which I used in business is Fielder, and</p> <p>12 my married name is McEneny.</p> <p>13 Q. Do you have a preference of</p> <p>14 Ms. McEneny versus Ms. Fielder?</p> <p>15 A. That's fine.</p> <p>16 Q. I'll try to make sure I get that</p> <p>17 correct. I was hoping you'd say Fielder.</p> <p>18 A. Before we sold the company I would</p> <p>19 have, but now I'm officially a one name person</p> <p>20 here.</p> <p>21 Q. My name is Srikanth Reddy, I</p> <p>22 represent the plaintiff in this matter, ePlus,</p> <p>23 Inc.</p> <p>24 Ms. McEneny, do you understand that</p> <p>25 your answers today are being given under oath</p>

<p>5</p> <p>1 and that you are under the same obligation as</p> <p>2 you would have been in court to answer</p> <p>3 truthfully and completely?</p> <p>4 A. Yes.</p> <p>5 Q. And have you ever given a</p> <p>6 deposition before?</p> <p>7 A. No.</p> <p>8 Q. And so in that case I'll go over</p> <p>9 some different rules, and if at any time you</p> <p>10 have any questions about the process or anything</p> <p>11 you should certainly feel free to ask those. If</p> <p>12 any of my questions are unclear just let me know</p> <p>13 and I'll try to clarify them.</p> <p>14 Will you do that?</p> <p>15 A. Sure.</p> <p>16 Q. If you need to take a break at any</p> <p>17 time, just let me know. I may ask you to wait</p> <p>18 if we are in the middle of a question, but</p> <p>19 otherwise we'll certainly take a break if you</p> <p>20 need to.</p> <p>21 Do you understand that?</p> <p>22 A. Um-hum.</p> <p>23 Q. And because the court reporter is</p> <p>24 typing all the questions and all the responses,</p> <p>25 he generally needs an audible response. So</p>	<p>7</p> <p>1 A. Yes.</p> <p>2 Q. And are you represented by counsel</p> <p>3 here today?</p> <p>4 A. Yes.</p> <p>5 Q. And who is that representing you?</p> <p>6 A. Todd Sahner.</p> <p>7 MR. REDDY: Ms. McEneny, I'm</p> <p>8 handing to the reporter what I would like</p> <p>9 him to mark as Exhibit No. 1.</p> <p>10 (McEneny Exhibit 1 for</p> <p>11 identification, Subpoena.)</p> <p>12 Q. You can take a couple, however much</p> <p>13 time you need to familiarize yourself with that</p> <p>14 document. And look up at me after you've had a</p> <p>15 chance to do so.</p> <p>16 A. Is this the one that was sent to me</p> <p>17 originally, or is this something different?</p> <p>18 Q. It should fairly and accurately</p> <p>19 depict what was sent to you. Perhaps if you</p> <p>20 want to take a look just to confirm.</p> <p>21 A. This looks identical.</p> <p>22 Okay.</p> <p>23 Q. So have you seen this document</p> <p>24 before?</p> <p>25 A. I believe this is the same document</p>
<p>6</p> <p>1 um-hum --</p> <p>2 A. Yes.</p> <p>3 Q. -- as opposed to yes, might be a</p> <p>4 little bit more helpful. Thank you.</p> <p>5 Are you taking any medication or</p> <p>6 drugs that would affect your ability to answer</p> <p>7 questions truthfully and accurately here today?</p> <p>8 A. No.</p> <p>9 Q. Is there any reason that you feel</p> <p>10 you would not be able to give truthful answers</p> <p>11 to my questions today?</p> <p>12 A. No.</p> <p>13 Q. Your counsel, Mr. Sahner, who I</p> <p>14 understand is Mr. Sahner, he may object from</p> <p>15 time to time. But unless he specifically</p> <p>16 instructs you not to answer one of my questions,</p> <p>17 I expect you to answer my question.</p> <p>18 Do you understand that?</p> <p>19 A. Yes.</p> <p>20 Q. And the court reporter here, again,</p> <p>21 he needs to take down everything we say. So he</p> <p>22 can't take down nonverbal responses or shakes of</p> <p>23 your head. So just make sure that you verbally</p> <p>24 respond to each of my questions. Do you</p> <p>25 understand that?</p>	<p>8</p> <p>1 that I was given when I was subpoenaed.</p> <p>2 Q. And if I can direct your attention</p> <p>3 to page number 7. The heading says "schedule A,</p> <p>4 documents."</p> <p>5 A. Um-hum.</p> <p>6 Q. Do you see that there are five</p> <p>7 requests for production listed there?</p> <p>8 A. Yes.</p> <p>9 Q. And have you produced documents in</p> <p>10 response to this subpoena?</p> <p>11 A. Yes, I have.</p> <p>12 Q. And what did you produce?</p> <p>13 A. Can I look? I brought a file of</p> <p>14 what I sent you. Is that okay?</p> <p>15 Q. Yes, that's appropriate, sure.</p> <p>16 A. I mailed to you a letter, let's</p> <p>17 see, all documents provided to Lawson, so</p> <p>18 basically I sent a letter. And it had the --</p> <p>19 some email correspondence with Rachel Hughey.</p> <p>20 And a copy of an engagement letter that they had</p> <p>21 sent. And, let's see what else was in here.</p> <p>22 And also I sent a USB, a ScanDisk</p> <p>23 with some attachments that Rachel had sent,</p> <p>24 which was a subpoena that their firm had sent me</p> <p>25 a letter, the SAP trial transcript, day one and</p>

<p style="text-align: right;">9</p> <p>1 day two, and -- so basically the content of what 2 she sent. 3 Q. I don't mean to interrupt you, but 4 perhaps to speed the process along, I can 5 represent that all the documents you produced to 6 us have been produced in this litigation and 7 given to Lawson Software. I kind of wanted to 8 go through the specific requests that were made. 9 Have you provided any documents to 10 Lawson during the course of this litigation? 11 A. The only things, I gave you 12 everything I would have given them. 13 Q. And are there any existing 14 agreements or contracts between you and the 15 defendant Lawson Software? 16 A. No. 17 Q. And have you invoiced or billed 18 Lawson Software for anything with regards to 19 this litigation? 20 A. No. 21 Q. And has Lawson provided any 22 documents to you during the course of this 23 matter? 24 A. Only the things I've given you. 25 Q. And did you review the documents</p>	<p style="text-align: right;">11</p> <p>1 other attorney from the Merchant & Gould law 2 firm or from anybody from Lawson Software with 3 regards to this matter? 4 A. Everything that's happened has been 5 documented and provided to you. 6 Q. Have you had any conversations with 7 anybody concerning the patents that are at issue 8 in this matter? 9 A. When you say anybody, my husband, 10 yeah, we've talked about it. 11 Q. Other than your husband, have you 12 had discussions with anybody with regards to the 13 patents that are at suit in this litigation? 14 THE WITNESS: Does that include our 15 conversation? 16 MR. SAHNER: Our conversations are 17 privileged. 18 A. Then no. 19 Q. I'm not asking about the specific 20 subject matter of anything you may have 21 discussed with your counsel. But are you 22 familiar with the patents that are at suit in 23 this litigation? 24 A. I read them very carefully years 25 ago. I have not looked at them. I only looked</p>
<p style="text-align: right;">10</p> <p>1 that Ms. Hughey sent to you during the course of 2 the litigation? 3 A. I did read it briefly. I haven't 4 studied it. 5 Q. And do you recall specifically what 6 documents she had sent you? 7 A. She sent me, basically my testimony 8 from the original trial, which was the ePlus/SAP 9 trial. So I did read through that. 10 Q. Do you know why she sent you those 11 specific documents? 12 A. No, not really. 13 Q. Did you have any conversations or 14 any discussions with anybody from Lawson 15 Software or the law firm of Merchant & Gould 16 with regards to this litigation? 17 A. Other than what I shared. I mean, 18 Rachel contacted me, which I summarized our 19 conversation for you and provided that. They 20 asked if I would be interested in being an 21 expert witness, and I indicated I'm not. 22 Q. And other than the conversations 23 that were summarized in the documents that you 24 provided, were there any other conversations or 25 discussions that you had with Ms. Hughey or any</p>	<p style="text-align: right;">12</p> <p>1 at my testimony. 2 Q. And when you say that you read them 3 carefully, how many patents are you referring 4 to? 5 A. I don't really recall how many 6 patents were in question. This was a few years 7 ago when I was involved in the ePlus versus SAP 8 case. 9 Q. When you say those patents, are you 10 referring to the patents that were at suit in 11 the SAP litigation? 12 A. Correct. 13 Q. Were there any patents other than 14 those patents that were at suit in the SAP 15 litigation assigned to ePlus that you reviewed? 16 A. No. 17 Q. Now, when you say that you 18 discussed the patents in suit with your husband, 19 what was the general substance of those 20 conversations? 21 MR. SAHNER: I just want to caution 22 the witness, your discussions with your 23 husband are privileged. What that means is 24 that you don't have to disclose what you 25 said, but you can disclose just the general</p>

<p style="text-align: right;">21</p> <p>1 Q. Just here testifying today, do you 2 recall the specific functionality that might 3 have been added from version 1 to version 12? 4 A. I remember some of it. 5 Q. Now, you testified that you no 6 longer are employed by or have any interest with 7 P.O. Writer -- I'm sorry, with Purchasing Net; 8 correct? 9 A. Correct. 10 Q. Have you retained any documents 11 from either Purchasing Net or American Tech that 12 were generated while you were affiliated with 13 those two companies? 14 A. I probably have a few things. Some 15 files. I have kept a couple of folders on 16 customers, you know, we were working with just 17 to make sure if anybody had any questions that 18 they wanted to call me, you know, they could. 19 So just trying to be helpful to the staff that 20 was left behind. We sold the company, so still 21 felt some responsibility to the people. 22 Q. So other than the customer folders, 23 are you aware of any other documents that you 24 might have retained from Purchasing Net? 25 A. You know, I'm not really sure, we</p>	<p style="text-align: right;">23</p> <p>1 A. To me it would be the same, it was 2 just a name change. 3 Q. Did American Tech have a general 4 policy with regards to the schedule by which it 5 would release different versions of the P.O. 6 Writer project? 7 A. Generally we did one major release 8 per year. 9 Q. So between 1984 and 1995, that's 10 twelve years actually, correct? I'm sorry, I'll 11 withdraw that question as well. 12 So the twelve DOS versions of the 13 P.O. Writer software, were each of those 14 versions released between 1984 and 1995? 15 A. Yes. 16 Q. Now, if I can start with -- I'm 17 sorry, so I think you testified that version 18 number 2 was released in 1985; correct? 19 A. I'd have to double-check, but that 20 sounds right. 21 Q. Was version 3 -- when was version 3 22 released then? 23 A. Generally they would be one major 24 release per year. That was the general 25 practice. So if you ask me about 3 then 4 then</p>
<p style="text-align: right;">22</p> <p>1 do have some things in the garage. And the 2 reason is Tim is writing a book, and I know he 3 saved some things. But I honestly don't know 4 what he has specifically. 5 Q. Now, I think you testified that 6 version 1 of the P.O. Writer software was 7 released in 1984; correct? 8 A. I believe that's correct. 9 Q. Do you recall when the second 10 version of P.O. Writer was released? 11 A. Probably about a year later, but I 12 don't know the exact date. 13 Q. So during that time frame, the 14 company was known as American Tech, correct? 15 So in general I'll try to refer to 16 it as American Tech for the company that you and 17 your husband started, which became Purchasing 18 Net in 2000 and which you subsequently sold in 19 2009. 20 A. Um-hum. 21 Q. Does that make sense? 22 A. That's fine. 23 Q. And if you have any questions at 24 any time as to what entity I'm referring to, you 25 could certainly feel free to ask.</p>	<p style="text-align: right;">24</p> <p>1 5, they kind of fall along that line. It was 2 the general practice to try and do that. 3 Q. Now, when was version 10 of the 4 P.O. Writer product released? 5 A. It was released in the -- well, can 6 I check my notes? I want to double-check to 7 make sure I get this right. 8 Q. Sure. 9 A. Should be '83, but let me just 10 double-check. 11 Yes, '83. I'm sorry, '93. 12 Q. When you say you were checking your 13 notes, the notes you were checking was your 14 testimony from the SAP case; is that correct? 15 A. That's right. 16 Q. Now, other than your testimony from 17 the SAP case, is there anything else that you 18 have to corroborate that version 10 of the P.O. 19 Writer product was released in 1993? 20 A. No. Just everything I testified to 21 originally would still be true. 22 MR. REDDY: I'm handing to the 23 reporter what I'll ask him to mark as 24 McEneny Exhibit No. 2. 25 (McEneny Exhibit 2 for</p>

<p style="text-align: right;">89</p> <p>1 that there was not a prohibition against</p> <p>2 duplication of either the software or the</p> <p>3 manuals with respect to the trial version of the</p> <p>4 software?</p> <p>5 MS. HUGHEY: Objection; asked and</p> <p>6 answered.</p> <p>7 A. Yeah, I think I've already answered</p> <p>8 that.</p> <p>9 Q. What was your answer?</p> <p>10 A. My answer is I believe that it was</p> <p>11 most probable that there was some kind of</p> <p>12 wording to protect us on that. But I couldn't</p> <p>13 say for sure unless I had the agreement in front</p> <p>14 of me.</p> <p>15 Q. If I could return for a moment to</p> <p>16 Exhibit No. 2, which was I believe the guided</p> <p>17 tour.</p> <p>18 A. Okay. Got it.</p> <p>19 Q. And the page which we've been</p> <p>20 referring to as L 126664. Which were the</p> <p>21 results from the purchase requisitioning</p> <p>22 section.</p> <p>23 A. Okay.</p> <p>24 Q. So if a user selected an item from</p> <p>25 this list, at this point was there any way that</p>	<p style="text-align: right;">91</p> <p>1 A. That's correct.</p> <p>2 Q. And those user defined fields could</p> <p>3 not have been searched in the version 10 of the</p> <p>4 P.O. Writer Plus system; correct?</p> <p>5 MS. HUGHEY: Objection;</p> <p>6 mischaracterizes the witness' testimony.</p> <p>7 A. The user defined fields could not</p> <p>8 be searched to do an item look up. And to my</p> <p>9 knowledge, and based on what's in this document,</p> <p>10 they couldn't be searched in this version.</p> <p>11 That's my understanding after looking at this</p> <p>12 document.</p> <p>13 So they were there for reference.</p> <p>14 Q. You can set that document aside.</p> <p>15 (McEneny Exhibit 5 for</p> <p>16 identification, document entitled "Tenth</p> <p>17 Edition," production numbers L 126501</p> <p>18 through L 126513.)</p> <p>19 MR. REDDY: I've handed a document</p> <p>20 to be marked as Exhibit No. 5, which is a</p> <p>21 document Bates labelled L 126501 through</p> <p>22 126513. And at the top it states "tenth</p> <p>23 edition," in parentheses, April 1993.</p> <p>24 Q. If you can take a few moments to</p> <p>25 familiarize yourself with that document.</p>
<p style="text-align: right;">90</p> <p>1 a user could cross-reference this item with</p> <p>2 other items in the P.O. Writer database?</p> <p>3 MS. HUGHEY: Objection; vague.</p> <p>4 Q. You can answer if you understand</p> <p>5 the question.</p> <p>6 A. On this screen, they're looking at</p> <p>7 a list of items that match their search</p> <p>8 criteria. If they were to select the</p> <p>9 combination, the ship forward to look for</p> <p>10 additional information, that's shown on the next</p> <p>11 page, the 665.</p> <p>12 The only way in this version that</p> <p>13 they could cross-reference is if they chose, as</p> <p>14 a customer, to implement the user defined fields</p> <p>15 or to provide additional information in the</p> <p>16 extended description area as to what a</p> <p>17 cross-reference might be. So that would</p> <p>18 strictly be how that particular customer might</p> <p>19 have chosen to implement the product.</p> <p>20 Q. And as we discussed earlier, that</p> <p>21 additional line information, the user defined</p> <p>22 fields within the additional line information,</p> <p>23 was entirely up to the user to enter whatever</p> <p>24 information they wanted to in those fields;</p> <p>25 correct?</p>	<p style="text-align: right;">92</p> <p>1 And do you recognize the collection</p> <p>2 of approximately twelve pages of documents?</p> <p>3 A. Yes, I recognize these as pages</p> <p>4 from the purchasing manual at that point in</p> <p>5 time.</p> <p>6 Q. Now, when you say that point in</p> <p>7 time, what are you referring to?</p> <p>8 A. Spring of '93.</p> <p>9 Q. And is that referring to version 10</p> <p>10 of the P.O. Writer Plus software?</p> <p>11 A. That's correct. This specifically</p> <p>12 would be relating to the purchasing module.</p> <p>13 Q. Now, if I can direct your attention</p> <p>14 to the third page of the document. It states</p> <p>15 "no part of this work may be reproduced or used</p> <p>16 in any way for or by any means, graphic,</p> <p>17 electronic or mechanical, including</p> <p>18 photocopying, recording, taping or information</p> <p>19 storage and retrieval systems, without express</p> <p>20 permission from American Tech, Inc."</p> <p>21 Did I read that correctly?</p> <p>22 A. Yes.</p> <p>23 Q. Now, was that prohibition against</p> <p>24 copying of the manual placed on every manual</p> <p>25 sent by American Tech with respect to version 10</p>

<p>125</p> <p>1 (Lawson Exhibit 102 for 2 identification, document, production 3 numbers L 0126482 through L 0126500.) 4 Q. I'm handing you what's been marked 5 Lawson Exhibit 102. Bates range L 0126482 to 6 500. 7 Do you recognize this document? 8 A. I do. 9 Q. What is this document? 10 A. This is the users manual for our 11 EDI interface. 12 Q. And again, do you see on the front 13 of the page that it says version 10.0? 14 A. Yes. 15 Q. Does this accurately represent the 16 product that was sold to customers prior to 17 August 10, 1993? 18 A. Yes. 19 Q. Is this a document that was 20 provided to customers prior to August 10, 1993? 21 A. Yes. 22 Q. You can put that aside. 23 (Lawson Exhibit 103 for 24 identification, document, production 25 numbers L 0126501 through L 0126513.)</p>	<p>127</p> <p>1 identification, Subpoena.) 2 Q. I'm handing you what's been marked 3 Lawson Exhibit 104. It is not a manual. I'm 4 going a little bit out of order because I wanted 5 to preserve the numbering of my documents. 6 Do you recognize that document? 7 A. Yes, I do. 8 Q. What is this document? 9 A. This was the subpoena emailed to me 10 by you to appear here today. 11 Q. Okay, I have no further questions 12 on that document. 13 (Lawson Exhibit 105 for 14 identification, document, production 15 numbers L 0126702 through L 0126717.) 16 Q. I'm handing you what's been marked 17 Lawson Exhibit 105. It's Bates number L 0126702 18 to L 0126717. 19 Do you recognize this document? 20 A. I do. 21 Q. What is this document? 22 A. The users manual for the P.O. 23 Writer Plus fax module. 24 Q. Does this accurately represent the 25 product that was sold to customers prior to</p>
<p>126</p> <p>1 Q. I'm handing you what's been marked 2 Lawson Exhibit 103. The Bates range is L 3 0126501 to L 0126513. 4 Do you recognize this document? 5 A. Yes, I do. 6 Q. What is it? 7 A. It's the section of the purchasing 8 manual for P.O. Writer Plus. 9 Q. Does this accurately represent the 10 product that was sold to customers prior to 11 August 10, 1993? 12 A. Yes. 13 Q. Is this a document that was 14 provided to customers prior to August 10, 1993? 15 A. Yes. 16 Q. And do you see the page L 0126501, 17 it says tenth edition, April 1993, software 18 revision 10.0? 19 A. Yes. 20 Q. Is that consistent with what you've 21 already told me about the other documents we've 22 discussed? 23 A. Yes. 24 Q. Okay. You can put that aside. 25 (Lawson Exhibit 104 for</p>	<p>128</p> <p>1 August 10, 1993? 2 A. Yes. 3 Q. Is this a document that's provided 4 to customers prior to August 10, 1993? 5 A. Yes. 6 Q. Okay, I have no further questions 7 on that document. 8 MR. SAHNER: Can we go off the 9 record for one second. 10 THE VIDEOGRAPHER: Going off the 11 record at 2:44. 12 (Discussion off the record.) 13 THE VIDEOGRAPHER: Back on the 14 record, 2:45. 15 (Lawson Exhibit 106 for 16 identification, document, production 17 numbers L 0127297 through L 0127504.) 18 BY MS. HUGHEY: 19 Q. I'm going to hand you what's been 20 marked Lawson Exhibit 106. It's marked L 21 0127297 to L 0127504. 22 Do you recognize this document? 23 A. Yes, I do. 24 Q. What is this document? 25 A. It's the users manual for the P.O.</p>